

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	Case No. 23-cr-10186-ADB
JAQUORI LYONS, et al.	)	
	)	
Defendants.	)	

**PROTECTIVE ORDER – CELLULAR PHONE DATA/EVIDENCE**

In connection with above-entitled case, particularly the disclosure of data/evidence recovered from cellular phones, the parties jointly propose a Phone Protective Order (the “Phone Order”) with the following terms:

- 1) For purposes of this Phone Order, the term “Defense Team” shall include attorneys of record, support staff, investigators and any other individuals retained to participate in the defense of this case.
- 2) The Defense Team shall maintain any pretrial documents/disclosures which are marked “Attorneys’ Eyes Only” in accordance with this Phone Order and these materials shall be used by the Defense Team solely and exclusively in connection with the litigation and trial of this case.
- 3) Any pretrial documents/disclosures which are marked “Attorneys’ Eyes Only” may not be disclosed and/or shown to any defendant in this case, but the Defense Team may verbally discuss such with its client.
- 4) Any pretrial documents/disclosures which are marked “Attorneys’ Eyes Only” shall not be disclosed and/or transmitted in any way (including in writing or electronically) to any person other than the Defense Team, unless otherwise ordered by this Court, but the Defense Team may verbally discuss such with its client.
- 5) This Phone Order shall not apply to any documents/disclosures being made to a defendant involving (a) that defendant’s personal cellular phone(s) (i.e., a phone(s) that had been possessed or owned by that specific defendant) or (b) communications made to or from that defendant, whether found on that defendant’s personal cellular phone(s) or on another cellular phone.
- 6) Absent further order of the Court, the terms and limitations of this Phone Order will continue to be in effect and binding following the termination of the case.

7) Execution of this Protective Order does not preclude any of the parties to this case, currently or in the future, from seeking leave from the Court to modify the conditions of this Phone Order at a later date.

Dated:

So Ordered,

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Hon. Donald L. Cabell  
United States Magistrate Judge

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**AGREEMENT TO THE TERMS OF PROTECTIVE ORDER REGARDING  
CELLULAR PHONE DATA/EVIDENCE**

I acknowledge and agree that I have reviewed the Phone Protective Order, dated \_\_\_\_\_, issued by the Court in the above-referenced case, and agree that I am bound by the terms of the Agreement and corresponding Order.

Dated:

Counsel for [DEFENDANT NAME]

\_\_\_\_\_  
[ATTORNEY NAME]